

LAW OFFICES OF BING LI, LLC

Bing Li, Esq. (BL 5550)

1350 Broadway, Suite 1001

New York, NY 10018-0947

(212) 967-7690

(212) 658-9788 (facsimile)

BLI@BLILLC.COM

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

STAR PACIFIC CORPORATION,

Plaintiff,

-against-

STAR ATLANTIC CORPORATION, a New Jersey Corporation, QI LU, individually and as agent for Star Atlantic Corporation (NJ), STAR ATLANTIC CORPORATION, a Florida Corporation, YAFEI ZHAO a/k/a ALFRED ZHAO, individually and as agent for Star Atlantic Corporation (FL/NJ), OCEAN TEXTILE CORPORATION, a Florida Corporation, ANNA KARINA, INC., a Florida Corporation, ZHENG LI a/k/a MICHAEL LI, individually and as agent for Star Atlantic Corporation (FL/NJ), Ocean Textile Corporation and Anna Karina, Inc., JOHN DOE # 1-10 and JANE DOE # 1-10, and XYZ CORPORATION #1-10, all names being fictitious and presently unknown,

Defendants.

Case No.: CV 08-4957 (SDW)

NOTICE OF MOTION

TO: STAR ATLANTIC CORPORATION, a NJ Corporation
c/o Qi Lu (Registered Agent)
200 Old Palisades Road, Apt. 5F
Fort Lee, NJ 07024
(Registered Agent Address)

STAR ATLANTIC CORPORATION, a New Jersey Corporation
c/o Qi Lu
51 Stonewall Ct.
Woodcliff Lake, NJ 07677
(Qi Lu's residence address)

STAR ATLANTIC CORPORATION, a Florida Corporation
c/o Yafei Zhao (Registered Agent)
10960 SW 15th Street, Apt. 206
Pembroke Pines, FL 33025
(Registered Agent Address)

YAFEI ZHAO a/k/a ALFRED ZHAO, pro se
2310 Wilderness Way
Marietta, GA 30066

ANNA KARINA, INC., a Florida Corporation
c/o Jaikishin U. Babani (Registered Agent)
4980 NW 165th Street, Unit A-15
Miami, Florida 33014
(Registered Agent Address)

Kun Zhao, Esq.
KEVIN KERVENG TUNG, P.C.
38-21 Main Street, Suite 3D
Flushing, NY 11354
(718) 939-4633
KEVINKERVENGTONGPC@GMAIL.COM
Attorney for Defendant Qi Lu

John R. Parker, Esq.
Law Offices of John R. Parker, LLC
260 Route 202/31 Suite 1100
Flemington, NJ 08822-1794
(908) 782 9458
JRP@JRPARKERLAW.COM
Attorney for Defendants Zheng Li a/k/a Michael Li
and Ocean Textile Corporation

John J. O'Connell, Esq.
Dawei Gongsun, Esq.
DAI & ASSOCIATES, P.C.
Queens Crossing Business Center
136-20 38th Avenue, Suite 9F
Flushing, NY 11354
(718) 888-8880

joconnell@daiassociates.com

dwgongsun@daiassociates.com

Attorneys pro hac vice for Defendants Zheng Li a/k/a Michael Li
and Ocean Textile Corporation

PLEASE TAKE NOTICE that, on Tuesday, February 16, 2010, at 9:30 a.m. or as soon hereafter as the parties and counsel may be heard, plaintiff STAR PACIFIC CORPORATION will move before the Honorable Susan D. Wigenton, U.S.D.J., in the Martin Luther King, Jr. Federal Building and Courthouse located at 50 Walnut Street, Newark, New Jersey 07101, for an order pursuant to Rule 55 of the Federal Rules of Civil Procedure for default judgment against (1) Star Atlantic Corporation, a New Jersey corporation, (2) Star Atlantic Corporation, a Florida corporation, (3) Yafei Zhao a/k/a Alfred Zhao, and (4) Anna Karina, Inc., a Florida corporation and for such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to the Clerk's Motion Calendar for 2010, any opposition papers shall be served on or before February 1, 2010.

PLEASE TAKE FURTHER NOTICE that in support of this motion plaintiff shall rely on the Declaration of Ya Ping Liu dated January 22, 2010, the Declaration of Bing Li dated January 22, 2010, together with the exhibits annexed thereto, and plaintiff's Brief dated January 22, 2010. A proposed form of Judgment is also submitted herewith.

LAW OFFICES OF BING LI, LLC
Attorneys for Plaintiff
Star Pacific Corporation

By: /s/
Bing Li

Dated: January 22, 2010

CERTIFICATE OF SERVICE

I, Bing Li, an attorney duly admitted to practice law before this Court, hereby certify that on this 22nd day of January, 2010, I served a true copy of the within Notice of Motion dated January 22, 2010, Declaration of Ya-Ping Liu dated January 22, 2010, Declaration of Bing Li dated January 22, 2010, together with the exhibits annexed thereto, and Plaintiff's Brief in Support of Motion for Default Judgment Pursuant to Rule 55 of the Federal Rules of Civil Procedure dated January 22, 2010, on the parties named herein as follows:

STAR ATLANTIC CORPORATION, a NJ Corporation
c/o Qi Lu (Registered Agent)
200 Old Palisades Road, Apt. 5F
Fort Lee, NJ 07024
(Registered Agent Address)
Via Regular Mail and Certified Mail, Return Receipt Requested

STAR ATLANTIC CORPORATION, a New Jersey Corporation
c/o Qi Lu
51 Stonewall Ct.
Woodcliff Lake, NJ 07677
(Qi Lu's residence address)
Via Regular Mail and Certified Mail, Return Receipt Requested

STAR ATLANTIC CORPORATION, a Florida Corporation
c/o Yafei Zhao (Registered Agent)
10960 SW 15th Street, Apt. 206
Pembroke Pines, FL 33025
(Registered Agent Address)
Via Regular Mail and Certified Mail, Return Receipt Requested

YAFEI ZHAO a/k/a ALFRED ZHAO, pro se
2310 Wilderness Way
Marietta, GA 30066
Via Regular Mail and Certified Mail, Return Receipt Requested

ANNA KARINA, INC., a Florida Corporation
c/o Jaikishin U. Babani (Registered Agent)
4980 NW 165th Street, Unit A-15
Miami, Florida 33014
(Registered Agent Address)
Via Regular Mail and Certified Mail, Return Receipt Requested

Kun Zhao, Esq.
KEVIN KERVENG TUNG, P.C.
38-21 Main Street, Suite 3D
Flushing, NY 11354

(718) 939-4633

KEVINKERVENGTONGPC@GMAIL.COM

Attorney for Defendant Qi Lu

Via ECF

John R. Parker, Esq.

Law Offices of John R. Parker, LLC

260 Route 202/31 Suite 1100

Flemington, NJ 08822-1794

(908) 782 9458

JRP@JRPARKERLAW.COM

Attorney for Defendants Zheng Li a/k/a Michael Li
and Ocean Textile Corporation

Via ECF

John J. O'Connell, Esq.

Dawei Gongsun, Esq.

DAI & ASSOCIATES, P.C.

Queens Crossing Business Center

136-20 38th Avenue, Suite 9F

Flushing, NY 11354

(718) 888-8880

joconnell@daiassociates.com

dwgongsun@daiassociates.com

Attorneys pro hac vice for Defendants Zheng Li a/k/a Michael Li
and Ocean Textile Corporation

Via ECF

/s/

Bing Li